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GOODWIN, PROCTER & HOAR

(A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS)

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March 21, 1989

BY HAND

Barbara Newman
Remedial Project Manager
U.S. Environmental Protection
Agency, Region I
Waste Management Division
(HRS-CAN 3)
JFK Federal Building
Boston, MA 02203-2211

Re: Comments on EPA's Proposed Remedy
for Woburn Wells G and H

Dear Barbara:

Yesterday, March 21, 1989, I mailed you Unifirst's comments on the Wells G & H preferred remedy and supporting documentation. With the thought that it might simplify your life, I am having delivered by hand with this letter two additional sets of those comments.

Sincerely,



Jeffrey C. Bates

JCB/dg

Enclosure

cc: Gretchen Muench (w/o enc.)

XP-1245/u

SDMS DocID

268696



March 21, 1989

Michael Deland
Regional Administrator
Region 1
United States Environmental Protection Agency
John F. Kennedy Federal Building
Boston, MA 02203

Dear Mr. Deland:

UniFirst Corporation has asked us to serve as an expert peer review panel for the Proposed Remedial Plan, RI/FS and Endangerment Assessment for the Wells G and H Superfund site in Woburn, Massachusetts. We have forwarded a technical report presenting the results of our review directly to your staff as specified in the Proposed Plan. We are writing you directly, however, because we found our task extremely frustrating, due to the poor quality of the record available for review, and because the remedy proposed on the basis of that record, raises serious health and environmental questions.

Upon our initial review, we found that the reports seemed to contain serious technical errors and oversights, while not containing adequate technical data to permit us to understand why the reports had been written as they were. When we attempted to obtain and review the technical data, we were informed that key data did not exist, and even that EPA had "guessed" at some extremely critical data (e.g., the fraction of organic carbon in the aquifer).

Consequently, we were compelled to review the available data, supplemented by data Dr. Cherry and ENSR had previously gathered for UniFirst and which had been provided to EPA, plus what limited additional data we could generate in the time available, and to develop our own interpretations of the results.

These interpretations are presented in the enclosed technical report. They are necessarily preliminary due to the data and time constraints we faced, and due to EPA's decision not to allow UniFirst and W.R. Grace to conduct a 30-day, pilot pumping and treatability test at and in the vicinity of their facilities early last summer. Nevertheless, we believe our preliminary conclusions are significant and wish to report them directly to you, as well as to your staff. In summary, based on the information currently available to us, they are:

1. Pumping groundwater in the Central Valley area will not "restore" the Aberjona aquifer to potable drinking water

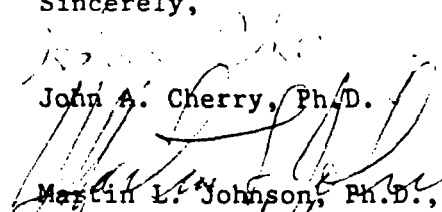
Mr. Michael Deland
March 21, 1989
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quality; instead it will draw non-VOC leukemogens, carcinogens, reproductive toxins and teratogens into the aquifer, along with coliform bacteria.

2. These agents will unavoidably be drawn into Wells G and H, at unpredictable and variable concentrations necessitating expensive, virtually perpetual treatment which may not be able to achieve drinking water standards reliably, completely independent of and apart from treatment of the VOCs attributed to the five source areas.
3. The treatment systems proposed by EBASCO are over-priced, poorly engineered, badly scoped, ineffective and contrary to basic principles of sanitary engineering.
4. The soil incineration proposed for the UniFirst property appears to be based on erroneous assumptions and improper and inadequate testing, and if so based, will be completely ineffective and wasteful.
5. If adopted, the remedy proposed will harm the environment and increase the risks to public health.

As we have stated, these conclusions are necessarily preliminary. They are, however, consistent with our expectations based on over 75 years' combined experience. Consequently, we have tried to propose what we believe to be a constructive, safe, effective alternative which could be implemented quickly without further public expenditures or risks to public health.

Sincerely,


John A. Cherry, Ph.D.


Martin L. Johnson, Ph.D., P.E.


Rudolph J. Jaeger, Ph.D., DABT

/dg
Enclosure
XP-1202/u